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FILED

FEB 26 2015

**RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

v.

JONATHAN MOTA

Defendant

CASE NO. 13-CR-93 JST

STIPULATION AND [PROPOSED] ORDER

For the reasons stated on the record at the last status hearing in this matter, the parties jointly request that the Court vacate the April 13, 2015 trial date and all pretrial dates associated with the April 13, 2015 trial date and set the following pretrial and trial schedule: **Friday, January 22, 2016**, deadline for filing in limine motions; **Friday, January 29, 2016**, deadline for filing oppositions to in limine motions; **Friday, February 5, 2016**, deadline for filing replies to in limine motions and date by which case-in-chief disclosures for experts are due (the government agrees to turn over expert names, CVs and

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reports as it is able to on a rolling basis); **Friday February 19, 2016**, hearing on in limine motions;
Wednesday, February 24, 2016 deadline for production of *Jencks/Giglio* materials that exist at the time
and witness and exhibit lists due; **Monday February 29, 2016**, pretrial conference; and **March 7, 2016**
jury selection and trial begin.

The parties jointly request an exclusion of time under the Speedy Trial Act, 18 U.S.C. section
3161, from April 13, 2015 through March 7, 2016. The exclusion is necessary in light of the need for
effective preparation of the case by the defendant and counsel as well as continuity of counsel for the
government because their trial schedules in other cases. Failure to grant the requested continuance
would unreasonably deny defendant and counsel the time necessary for effective preparation, taking into
account the exercise of due diligence and the need for counsel to review discovery and conduct further
investigation.

Respectfully submitted

So stipulated

2/27/15

_____/s/_____
KATHRYN HAUN
Assistant U.S. Attorney

So stipulated

2/27/15

_____/s/_____
RICHARD MAZER ESQ.
Standby Counsel for Defendant Pro Se Mota

~~PROPOSED~~ ORDER

For the reasons contained in the above stipulation, IT IS ORDERED that the April 13, 2015 trial date is vacated and the new trial schedule is as follows:

Friday, January 22, 2016: deadline for filing in limine motions;

Friday, January 29, 2016: deadline for filing oppositions to in limine motions;

Friday, February 5, 2016: deadline for filing replies to in limine motions and date by which case-in-chief disclosures for experts are due; (The government agrees to turn over expert names, CVs and reports on a rolling basis as the government receives them);

Friday February 19, 2016: hearing on in limine motions;

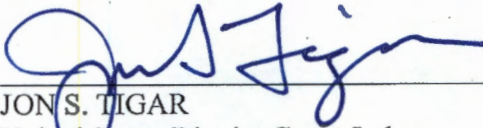
Wednesday, February 24, 2016: deadline for production of *Jencks/Giglio* materials that exist at the time and witness and exhibit lists due;

Monday, February 29, 2016: pretrial conference; and

Monday, March 7, 2016: jury selection and trial begin.

For the reasons contained in the above stipulation, and on the record at the last status hearing in this matter, IT IS FURTHER ORDERED that the period from April 13, 2015 through March 7, 2016 is excluded from Speedy Trial Act calculations under 18 U.S.C. section 3161(h)(7)(A) and (B)(ii) and (iv). The ends of justice served by excluding the period from April 13, 2015 through March 7, 2016 outweigh the best interest of the public and the defendant in a speedy trial.

DATED: 2/26/15


JON S. TIGAR
United States District Court Judge